

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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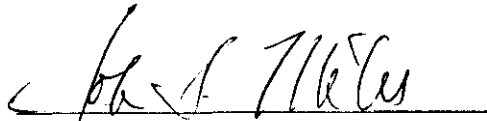
Experimental "Ride-Along")
Classification Change for Periodicals)

Docket No. MC2000-1

COX TARGET MEDIA, INC.
AND COX CONSUMER SAMPLING
FOURTH INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO POSTAL SERVICE WITNESS ALTAH H. TAUFIQUE (CC/USPS-T1-23-26)
(November 16, 1999)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Cox Target Media, Inc. and Cox Consumer Sampling, proceeding jointly herein as the "Cox Companies," hereby submit interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,



William J. Olson

John S. Miles

WILLIAM J. OLSON, P.C.

8180 Greensboro Drive, Suite 1070

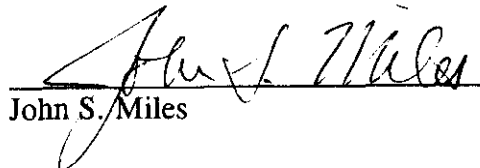
McLean, Virginia 22102-3823

(703) 356-5070

Counsel for Cox Target Media, Inc.
and Cox Consumer Sampling

CERTIFICATE OF SERVICE

I hereby certify that I have this day served by hand delivery or mail the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.


John S. Miles

November 16, 1999

CC/USPS-T1-23.

- a. What are the current physical requirements and restrictions for inserts (or onserts) to periodicals that pay the applicable Standard (A) rate of postage? Please provide the relevant DMM reference with respect to each such requirement or restriction.
- b. In what ways, if any, do the proposed physical requirements and restrictions for inserts (or onserts) at the Ride-Along rate differ from the existing requirements for Periodicals inserts (or onserts) that pay the applicable Standard (A) rate of postage?
- c. Under the Ride-Along experiment as proposed in this Docket, could an insert (or onsert) whose physical characteristics do not permit it to qualify for the 10-cent Ride-Along rate be mailed as an insert (or onsert) at the applicable Standard (A) rate? Please explain fully any answer that is not an unqualified negative.

CC/USPS-T1-24.

Library Reference CC-LR-2 in this Docket contains two exhibits, A and B. Exhibit A is a sealed plastic envelope/packet which has a height of 5 1/4 inches and length of 11 inches, weighs approximately 1.1 ounces, and contains both skin care and lipstick samples. Exhibit B is identical to Exhibit A, except that the sealed packet has been opened to display the contents for inspection. A copy of Library Reference CC-LR-2 is being submitted to the Postal Service with these interrogatories.

- a. Under the Ride-Along experiment proposed in this Docket, could Exhibit A be mailed at the proposed 10-cent Ride-Along rate as a periodical insert or onsert? Unless your

answer is an unqualified affirmative or negative – *i.e.*, if “yes” under certain circumstances, but not others – please explain fully.

- b. If your answer is negative, please explain all reasons why Exhibit A would not qualify for the 10-cent Ride-Along rate.
- c. Unless your answer to subpart a above is an unqualified affirmative, please explain whether Exhibit A could be mailed as an onsert at the applicable Standard (A) rate of postage.

CC/USPS-T1-25

- a. Under the proposed experiment, will the Ride-Along enclosure require an endorsement on it? If not, please explain fully why not.
- b. If an endorsement will be required,
 - (i) where would the endorsement be located?
 - (ii) what font size would be required for the endorsement?
 - (iii) what would be the method of payment (*e.g.*, permanent imprint, precanceled or meter stamp)?
 - (iv) where would the postage/imprint be placed?
- c. Will the periodical be required to indicate that it carries a Ride-Along enclosure? If so, what will be required?
- d. If definite answers to any question(s) in this interrogatory cannot be given (*e.g.*, because DMM regulations are not yet drafted), please answer such question(s) based upon your opinion as to what type of DMM regulations would be desirable.

CC/USPS-T1-26

In your testimony, you refer to the proposed Ride-Along piece as an “enclosure” or “attachment.”

- a. Please define “enclosure” and explain if “enclosure” is synonymous with “insert.” If not, please describe any difference.
- b. Please define “attachment” and explain if “attachment” is synonymous with “insert.” If not, please describe any difference.